

Exhibit B

Fabien Thayamballi

From: Kathleen E. Cassidy <KCassidy@hafetznecheles.com>
Sent: Thursday, March 21, 2019 11:53 AM
To: Penza, Moira Kim (USANYE); Hajjar, Tanya (USANYE); Lesko, Mark (USANYE)
Cc: Mark Geragos; Tina Glandian; Caroline Grosshans; Alexandra Shapiro; Fabien Thayamballi; Marc Agnifilo (Marc@braflaw.com); Teny Geragos; Bill McGovern; Sean Buckley; Matthew.Menchel@kobrekim.com; Justine Harris; 'Amanda Ravich'; Diaz, Hector J. ; Andrea Tazioli
Subject: Bronfman Requests for Particulars
Attachments: 2019.03.16 Bronfman BOP Letter.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Moira, Tanya, and Mark:

In addition to the requests for particulars we sent by letter dated 3/16/19 (attached), please see the below requests for particulars related to the charges in the Second Superseding Indictment. Please let us know by the end of the day today whether you intend to provide information in response to our particulars requests (other than the request for Jane and John Does, which you have already provided), so that if you decline to, we can include a motion on these grounds in our motion papers due tomorrow.

- a. Count One alleges that the pattern of racketeering activity consisted of acts indictable under broad sections of the United States Code. Please identify the specific statutory provisions under which these acts were allegedly indictable. In addition, for any alleged offense that depends on the violation or intended violation of another provision of law, please identify that specific provision.
- b. For Count Two, Racketeering Act 5, please identify the specific provisions under 18 U.S.C. §§ 2511 and 2701 that the defendants allegedly violated or intended to violate.
- c. For Count Two, Racketeering Act 8, please identify the specific provision under 18 U.S.C. § 1546 that the defendant allegedly violated or intended to violate (including the specific paragraph within subsection (a), if applicable).

Thank you,
Kate

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